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20  
21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:20-CV-02156-APG-NJK

**STIPULATION AND ORDER  
EXTENDING TIME TO RESPOND TO  
REMAND MOTION AND MOTION  
FOR FEES**

**(FIRST REQUEST)**

Defendant Fidelity National Title Insurance Company (“Fidelity”) and plaintiff Wells Fargo Bank N.A. (“Wells Fargo”) hereby agree and stipulate as follows:

1. On November 23, 2020, Wells Fargo filed its Complaint in the Eighth Judicial District Court, Case No. A-20-825267-C;
2. On November 23, 2020, Fidelity removed the action to this Court;

3. On December 18, 2020, Wells Fargo filed a motion to remand and a motion for fees and costs (ECF Nos. 11 and 12);

4. Fidelity's current deadline to respond to the motions is January 4, 2021;

5. Wells Fargo's motions are based upon the forum defendant rule, 28 U.S.C. § 1441;

6. The parties have mutually agreed to extend Fidelity's deadline to respond to Wells Fargo's motions by approximately 30 days, to further evaluate how the dissolution of defendant Land Title of Nevada, Inc. impacts the motions and the arguments made therein;

7. Wells Fargo does not oppose the extension;

8. This is the first request for an extension which is made in good faith and not for purposes of delay;

**IT IS SO STIPULATED** that Fidelity's deadline to respond to Wells Fargo's motion to remand and a motion for fees and costs (ECF Nos. 11 and 12) is hereby extended through and including Wednesday, February 3, 2021.

Dated: December 30, 2020

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair

KEVIN S. SINCLAIR

Attorneys for Defendants

FIDELITY NATIONAL TITLE INSURANCE

COMPANY and FIDELITY NATIONAL

TITLE GROUP, INC.

Dated: December 30, 2020

WRIGHT FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner

DARREN T. BRENNER

Attorneys for Plaintiff

WELLS FARGO BANK, N.A.

**IT IS SO ORDERED.**

Dated this 30th day of December, 2020.

  
ANDREW P. GORDON

UNITED STATES DISTRICT JUDGE